

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

INGRID M. FISHER :  
AND :  
SYLVIA AYLER : CIVIL ACTION  
Plaintiff : NO.: 2:12-CV-3834  
v. :  
COMMONWEALTH FINANCIAL :  
SYSTEMS, INC. :  
And :  
NORTHEAST CREDIT AND :  
COLLECTONS, INC. :  
And :  
SALLIE MAE, INC. ADMIN AGENT :  
FOR SLM EDUCATION LOAN CORP. :  
Defendants :  
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**MOTION OF DEFENDANT COMMONWEALTH FINANCIAL SYSTEMS, INC.,**  
**TO VACATE DEFUALT JUDGMENT PURSUANT TO FED.R.CIV.P. 55 (c) and**  
**60(B)**

Pursuant to Federal Rule of Civil Procedure 55(c) and 60(b), Defendant, Commonwealth Financial Systems, Inc., by and through its attorneys, Edwin A. Abrahamsen & Associates P.C., hereby moves this Honorable Court to Vacate the Default Judgment entered on January 31, 2013, and permit it to present its meritorious defenses and/or claims in this matter. Defendant's requests are based on the attached Memorandum of law and Proposed Answer.

Edwin A. Abrahamsen & Associates, P.C.

DATE: May 31, 2013

BY: /s/ Michael F. Ratchford

Michael F. Ratchford, Esquire

PA Attorney I.D. No.: 86285

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